

Schechter, Jody E.

From: Schechter, Jody E.
Sent: Tuesday, January 19, 2016 9:15 AM
To: 'Joseph Keenan'
Cc: Smith, Rachel M.; Hochmuth, Farrell
Subject: RE: Picard v. Armand Greenhall; APN 10-05048 - Substitution of counsel and Initial Disclosures

Joe,

I'm following up on the below.

Your clients' Initial Disclosures are a month overdue. Could you please let us know when we can expect to receive them?

Thank you,
Jody

Jody Schechter | BakerHostetler
811 Main Street | Suite 1100 | Houston, TX 77002-6111
T 713.646.1319 | F 713.751.1717
jschechter@bakerlaw.com

From: Joseph Keenan [<mailto:jfkeenan@joekeenanlaw.com>]
Sent: Monday, December 28, 2015 3:37 PM
To: Schechter, Jody E.
Subject: RE: Picard v. Armand Greenhall; APN 10-05048 - Substitution of counsel and Initial Disclosures

Jody

I will get both documents to you.

Thank you.

Joe Keenan

From: Schechter, Jody E. [<mailto:jschechter@bakerlaw.com>]
Sent: Monday, December 28, 2015 12:27 PM
To: Joseph Keenan
Cc: Hochmuth, Farrell; Smith, Rachel M.
Subject: RE: Picard v. Armand Greenhall; APN 10-05048 - Substitution of counsel and Initial Disclosures

Joe,

I'm following up on my email below, regarding substitution of counsel to reflect your change of firm. Additionally, I don't believe we've received your clients' Initial Disclosures, which were due on December 18. Apologies if we've missed an email.

Could you please provide an update?

Thank you, and happy holidays.

Jody

Jody Schechter | BakerHostetler

811 Main Street | Suite 1100 | Houston, TX 77002-6111
T 713.646.1319 | F 713.751.1717
jschechter@bakerlaw.com

From: Schechter, Jody E.
Sent: Tuesday, December 15, 2015 10:56 AM
To: jfkeenan@joekeenanlaw.com
Cc: Hochmuth, Farrell; Smith, Rachel M.
Subject: Picard v. Armand Greenhall; APN 10-05048 - Substitution of counsel

Joe,

Because you filed an Answer on behalf of the Estate of Armand Greenhall and Deidre Sweeney while at McCanliss & Early, LLP, that firm is on the court's docket. We will need to serve all papers on McCanliss, in addition to you, unless there is a substitution on the record. Could you please file a Notice of Substitution of counsel, to substitute your firm in place of McCanliss?

Thank you,
Jody

| My Bio | Web site | vCard |
|--|--|---|
| T 713.646.1319 F 713.751.1717 www.bakerlaw.com | Jody Schechter jschechter@bakerlaw.com | BakerHostetler 811 Main Street Suite 1100 Houston, TX 77002-6111 |
| BakerHostetler | | |

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Schechter, Jody E.

From: Schechter, Jody E.
Sent: Friday, February 05, 2016 10:57 AM
To: jfkeenan@joekeenanlaw.com
Cc: Hunt, Dean D.; Smith, Rachel M.; bneville@laxneville.com; rkraus@laxneville.com
Subject: APN 10-05048, Picard v. Estate of Armand Greenhall - overdue Initial Disclosures
Attachments: Adv. Pro. No. 10-05048 - Letter to Joseph Keenan regarding overdue Initial Disclosures.pdf

Joe,

Please see attached a copy of correspondence to you from Dean Hunt regarding your clients' overdue Initial Disclosures in the above-referenced proceeding, as well as our request that you file a Notice of Substitution of Counsel, to note your change in law firm.

A hardy copy has been sent to you by first class mail.

Thank you,
Jody

| My Bio | Web site | vCard |
|--|--|-------|
| T 713.646.1319 F 713.751.1717 www.bakerlaw.com | Jody Schechter jschechter@bakerlaw.com BakerHostetler 811 Main Street Suite 1100 Houston, TX 77002-6111 BakerHostetler | |

BakerHostetler

Baker & Hostetler LLP

811 Main Street
Suite 1100
Houston, TX 77002-6111

T 713.751.1600
F 713.751.1717
www.bakerlaw.com

Dean D. Hunt
direct dial: 713.646.1346
dhunt@bakerlaw.com

February 5, 2016

Via Email and First Class Mail

Joseph F. Keenan (jfkeenan@joekeenanlaw.com)
114-04 Beach Channel Drive Suite 9
Rockaway Park, NY 11694

McCanliss & Early LLP
Wall Street Plaza
88 Pine Street
New York, New York 10005

Re: Adv. Pro. No. 10-05048 (SMB); *Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Estate of Armand L. Greenhall, et al.*; In the United States Bankruptcy Court for the Southern District of New York.

Dear Mr. Keenan:

Pursuant to the parties' agreed upon Case Management Notice in the above-referenced adversary proceeding, your clients' Initial Disclosures were due December 18, 2015. Over a month has now passed since the deadline, and they have not been served.

We reminded you of your clients' failure to serve Initial Disclosures on two separate occasions, on December 28, 2015 and January 19, 2015. On Tuesday, January 26, you indicated that you would have your clients' Initial Disclosures to us in the next few days. It has been more than a week, yet to date, we have not received them.

On August 21, 2015, Judge Bernstein signed an order compelling defendants in a separate adversary proceeding to serve Initial Disclosures. The order is attached for your reference.

If we do not receive your clients' Initial Disclosures by Friday, February 12, we will call you on Monday, February 15 to comply with Judge Bernstein's Chambers Rules and Rule 7007-1 of the Local Rules of the United States Bankruptcy Court, prior to filing a letter with Judge Bernstein seeking a discovery conference to discuss this issue.

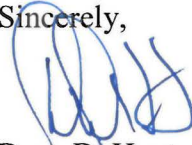
Because you filed an Answer to the Trustee's Complaint while at McCanliss & Early, LLP ("McCanliss"), McCanliss is on the Court's docket as counsel of record for the Estate of Armand L. Greenhall and Deidre Sweeney. On December 15, 2015, we advised you that we will continue to serve all papers on both you and McCanliss, unless there is a substitution on the record, and asked you to file a Notice of Substitution of Counsel. We followed up on this request on December 28, 2015 and January 19, 2015, but a substitution has not yet been filed.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Denver
Houston Los Angeles New York Orlando Philadelphia Seattle Washington, DC

Joseph F. Keenan
McCanliss & Early LLP
February 5, 2016
Page 2

We ask once again that you file a Notice of Substitution, so that we may stop serving papers on McCanliss.

Sincerely,



Dean D. Hunt
Of Baker & Hostetler LLP

Enclosure

cc: Brian J. Neville (bneville@laxneville.com)
Raquel Kraus (rkraus@laxneville.com)
Lax & Neville LLP
1450 Broadway, 35th Floor
New York, NY 10018

Schechter, Jody E.

From: Hochmuth, Farrell
Sent: Monday, April 04, 2016 11:43 AM
To: Joseph Keenan
Cc: Smith, Rachel M.; Schechter, Jody E.
Subject: RE: APN 10-05048; Picard v. Greenhall - Notice of Substitution

Joe,

Until you file the Notice of Substitution with the Court, the Court's website will reflect that McCanliss is counsel of record and all notices will go to McCanliss. If a hearing is scheduled, McCanliss will get notice, not you. Further, until McCanliss is substituted, we will continue to serve McCanliss with all correspondence and pleadings.

Please file the Notice.

Thank you, Farrell

From: Schechter, Jody E.
Sent: Tuesday, February 23, 2016 2:17 PM
To: Joseph Keenan
Cc: Hochmuth, Farrell; Smith, Rachel M.
Subject: APN 10-05048; Picard v. Greenhall - Notice of Substitution

Joe,

In follow up to your letter of February 18, do you plan to file the Notice of Substitution with the Court? McCanliss & Early LLP is on the Court's docket, so we need to serve all papers on McCanliss, in addition to you, until there is a substitution on the record.

Please feel free to contact me if you'd like to discuss.

Regards,
Jody

| My Bio | Web site | vCard |
|--|--|---|
| T 713.646.1319 F 713.751.1717 www.bakerlaw.com | Jody Schechter jschechter@bakerlaw.com | BakerHostetler 811 Main Street Suite 1100 Houston, TX 77002-6111 |

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BakerHostetler

Baker&Hostetler LLP

811 Main Street
Suite 1100
Houston, TX 77002-6111

T 713.751.1600
F 713.751.1717
www.bakerlaw.com

Dean D. Hunt
direct dial: 713.646.1346
dhunt@bakerlaw.com

April 5, 2016

VIA FIRST CLASS AND ELECTRONIC MAIL

Joseph F. Keenan (jfkeenan@joekeenlaw.com)
114-04 Beach Channel Drive Suite 9
Rockaway Park, NY 11694

McCanliss & Early, LLP
Wall Street Plaza
88 Pine Street, 21st Floor
New York, NY 10005

Re: Adv. Pro. No. 10-05048 (SMB); *Picard v. Estate of Armand L. Greenhall, et al.*; In the
United States Bankruptcy Court for the Southern District of New York.

Dear Counsel:

Enclosed please find the following:

1. Trustee's First Set of Requests for Admission to Defendant Estate of Armand L. Greenhall;
2. Trustee's First Set of Requests for Admission to Defendant Deidre Sweeney;
3. Trustee's First Set of Interrogatories to Defendant Estate of Armand L. Greenhall;
4. Trustee's First Set of Interrogatories to Defendant Deidre Sweeney;
5. Trustee's First Set of Requests for Production to Defendant Estate of Armand L. Greenhall; and
6. Trustee's First Set of Requests for Production to Defendant Deidre Sweeney.

Please note that because the Bankruptcy Court's docket still reflects McCanliss & Early, LLP as counsel of record, we are continuing to serve McCanliss & Early, LLP with all correspondence and documents. We will continue to do so until a notice of substitution is filed with the Court and entered on the record.

Please be reminded of Defendants' continuing obligations to preserve, retain and protect all possibly relevant documents in their possession, custody or control, as more fully described in our preservation letters sent to counsel on August 15, 2014 and to Mr. Armand L. Greenhall's address on June 14, 2011. Copies are enclosed.

Should you have questions, please feel free to contact me or Rachel M. Smith at (713) 646-1386.

Sincerely,



Dean D. Hunt
Of Baker & Hostetler, LLP

Enclosures

cc: Brian J. Neville (bneville@laxneville.com)
Raquel Kraus (rkraus@laxneville.com)
Lax & Neville, LLP
1450 Broadway, 35th Floor
New York, NY 10018